

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CYNTHIA JOHNSON, BRENDA BEZEREDI, and  
JAINE BIALK, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

THE BOEING COMPANY,

Defendant.

Case No. 2:19-cv-00597-RSM

**JOINT MOTION FOR FINAL  
APPROVAL OF SETTLEMENT  
AGREEMENT**

**NOTE ON MOTION CALENDAR:  
June 2, 2021**

Plaintiffs Jaine Bialk and Brenda Bezeredi<sup>1</sup> and Defendant The Boeing Company (the “Parties”) respectfully move this Court for an Order approving as final the settlement reached by the Parties as embodied in their Settlement Agreement (the “Agreement”) (Dkt. 42-1), which the Court preliminarily approved on February 19, 2021 (Dkt. 44).

For the reasons set forth in the supporting Memorandum of Law and the attached declaration, the proposed Agreement is “fair, reasonable, and adequate.” The Agreement provides

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<sup>1</sup> Plaintiff Cynthia Johnson died on April 2, 2020, while this matter was stayed pending settlement discussions. Pursuant to the Court’s Order (Dkt. 40), Ms. Johnson’s eldest son, David Johnson, has been substituted for Ms. Johnson for the purpose of administering the distribution of Ms. Johnson’s incentive payment and share of the settlement fund to her estate.

JOINT MOTION FOR FINAL  
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McGillivray Steele Elkin LLP  
1101 Vermont Ave. NW, Suite 1000  
Washington, DC 20005  
(202) 833-8855

Settlement Class members with substantial monetary relief and satisfies all other criteria for final approval. Accordingly, the Parties respectfully request that this Court grant this Motion and:

(1) State that a *bona fide* legal dispute exists between the Parties as to whether Settlement Class Members are owed any wages, overtime compensation, statutory damages, and related relief;

(2) Approve the Agreement, including all information contained in the Notice of Class and Collective Action Settlement, as fair, reasonable, adequate, and binding on all Named Plaintiffs and Settlement Class Members who did not opt out of the Settlement, and with respect to the FLSA claims, binding on all Settlement Class Members who either cash their Settlement Check or obtain the Settlement Payment from the Unclaimed Property Division;

(3) Approve the procedure to pay the Class Settlement Fund into the Qualified Settlement Fund (“QSF”) in accordance with Paragraph 10.5 of the Agreement;

(4) Order administration of the QSF in accordance with Sections 10-13 of the Agreement;

(5) Order entry of a Stipulation of Dismissal in accordance with the Agreement;

(6) Approve the Attorneys’ Fees and Actual Expenses in accordance with Paragraph 9.4 of the Agreement; and

(7) Retain jurisdiction over the interpretation and implementation of the Agreement, as well as any and all matters arising out of or related to the interpretation of the Agreement.

1 Dated: June 2, 2021

/s/ Molly A. Elkin

Molly A. Elkin (*admitted pro hac vice*)  
Sarah M. Block (*admitted pro hac vice*)  
McGillivray Steele Elkin LLP  
1101 Vermont Ave. NW  
Suite 1000  
Washington, DC 20005  
Phone: (202) 833-8855  
Email: [mae@mselaborlaw.com](mailto:mae@mselaborlaw.com)  
Email: [smb@mselaborlaw.com](mailto:smb@mselaborlaw.com)

/s/ Alex Skalbania

Skalbania & Vinnedge (WA Bar #15412)  
3600 15th Avenue W Suite 201  
Seattle, WA 98119  
Phone: (206) 799-6937  
Email: [askalbania@aol.com](mailto:askalbania@aol.com)

Patricia L. Vannoy (*admitted pro hac vice*)  
Mattson Ricketts Law Firm  
134 S. 13th Street, Ste. 1200  
Lincoln, NE 68508  
Phone: (402) 475-8433  
Email: [plv@mattsonricketts.com](mailto:plv@mattsonricketts.com)

*Attorneys for Plaintiffs*

/s/ Chelsea Dwyer Petersen

Chelsea Dwyer Petersen  
William B. Stafford  
Charles N. Eberhardt  
Stephanie R. Holstein  
Perkins Coie LLP  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101  
Phone: (206) 359-8000  
Facsimile: (206) 359-9000  
Email: [CDPetersen@perkinscoie.com](mailto:CDPetersen@perkinscoie.com)  
Email: [BStafford@perkinscoie.com](mailto:BStafford@perkinscoie.com)  
Email: [CEberhardt@perkinscoie.com](mailto:CEberhardt@perkinscoie.com)  
Email: [SHolstein@perkinscoie.com](mailto:SHolstein@perkinscoie.com)

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2021, the foregoing Motion was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of the filing to all Counsel of Record.

/s/ Molly A. Elkin

Molly A. Elkin